Summary of Written Comments
Postmarked by July 14, 2005
for
10 CSR 20-7.015 Effluent Regulations
and
10 CSR 20-7.031 Water Quality Standards

State of Missouri
Department of Natural Resources
Division of Environmental Quality
Water Protection Program

Written Comments on
10 CSR 20-7.015 Effluent Regulations and
10 CSR 20-7.031 Water Quality Standards

Acronym	Organization Name
B&W	Bartlett and West Engineers
BCRSD	Boone County Regional Sewer District
CS	Concentric Sourcing
FC-PWSD#1	Public Water Supply District #1 of Franklin County
FC-PWSD#3	Public Water Supply District #3 of Franklin County
HBA-SL	Home Builders Association of Greater St. Louis
L&G	Lathrop and Gage
LBVSD	Little Blue Valley Sewer District
MAIC	Missouri Ag Industries Council, Inc.
MCCI	Missouri Chamber of Commerce and Industry
MCE	Missouri Coalition for the Environment
MDC	Missouri Department of Conservation
MDNR-ESP	Missouri Department of Natural Resources, Environmental Services Program
MMU	Marshall Municipal Utilities
MRWA	Missouri Rural Water Association
NPS	National Park Service
RCGA	St. Louis Regional Chamber and Growth Association
REGFORM	
SAMA	Southwest Area Manufacturers Association
SC	Sierra Club
SMCS	Show-Me Clean Streams
UAC	Urban Areas Coalition
USEPA	United States Environmental Protection Agency

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#	Commentor	Rule	Subject	Summary of Written Comment
1	B&W	ER	Bacteria	The rule should provide an automatic disinfection waiver on all high surface area lagoons.
2	MDC	ER	Bacteria	Reference to E. Coli should be made wherever there is mention of Fecal Coliform in the effluent regs in order to begin the transition to the new indicator species.
3	MRWA	ER	Bacteria	Wants better definition of periods during which relief from standards is justifiable (use of mixing zones, critical-flow conditions, upstream pollution, etc.)
4	MRWA	ER	Bacteria	Bacteria effluent limitations should not be required for discharges beyond two miles from a recreational use stream.
5	SC	ER	Bacteria	Bacteria standard should be a single sample (daily) maximum
6	UAC	ER	Bacteria	Fecal Coliform limits should be as geometric means vs monthly averages
7	UAC	ER	Bacteria	Determine bacteria limits for secondary contact recreation through site-specific criteria (9x too arbitrary)
8	SC	ER	Dechlorination	All chlorinated effluent should be dechlorinated to protect aquatic life
9	UAC	ER	Dechlorination	Clarify dechlorination requirements for Mo and Miss Rivers
10	L&G	ER	Detection Level	Effluent limits below detectability are inappropriate
11	MMU	ER	Disinfection	Money for disinfection better spent in upgrading WWTF aging collection system. Impact on public health due to disinfection is nominal and not justified by the cost.
12	William Reeves, Ph.D.	ER	General	I fully support the department's efforts to comply with the Clean Water Act by adopting regulations that will bring Missouri's WQS into agreement with federal law and regulations.
13	Cary Sayre	ER	High Flow Exemption	A high flow exemption is necessary for many streams. Believe that almost anyone with considerable WWTF design experience would confirm. Gave an explanation of plant design and operation.
14	L&G	ER	High Flow Exemption	Exemptions during high flow periods should be liberally applied with the application of the standard established in rule.
15	MAIC	ER	High Flow Exemption	The high flow exemption should allow for exemptions for stream segments within 2 miles of the effluent point.
16	National Park Service	ER	High Flow Exemption	The high flow suspension should be granted regardless of downstream dischargers
17	MAIC	ER	High Flow Exemption	The suspension should not require the dischargers compliance with water quality based effluent limits
18	MAIC	ER	High Flow Exemption	The suspension does not to follow EPA's May 2002 draft guidance on bacteria controls
19	MAIC	ER	High Flow Exemption	Exemption should be related to specified flow conditions
20	MRWA	ER	High Flow Exemption	Supports efforts to amend the rule on wet weather discharges

#	Commentor	Rule	Subject	Summary of Written Comment
21	MRWA	ER	High Flow Exemption	Wet weather exemption should allow for use removal based on any of the six criteria offered through a UAA process.
22	UAC	ER	High Flow Exemption	Revision to wet weather discharge restriction (only that in excess of treatment capacity)
23	UAC	ER	High Flow Exemption	High Flow Exemption - remove need to specific CWC approval, rely on permitting process for public involvement
24	USEPA	ER	High Flow Exemption	High Flow Exemption - must be clarified
25	William Reeves, Ph.D.	ER	High Flow Exemption	I must take strong exception to the department's attempt to include a "wet weather suspension" of bacteria standards. The proposed amendment would erase recreational uses whenever a discharger is able to demonstrate through a UAA that uses do not exist, completely ignoring whether the use is attainable.
26	William Reeves, Ph.D.	ER	High Flow Exemption	The amendment does not define "wet weather", "use assessment" or "period of suspension".
27	William Reeves, Ph.D.	ER	High Flow Exemption	The amendment fails to explain how compliance with water quality criteria to protect contact recreation will be assessed once the "period of suspension" ends.
28	William Reeves, Ph.D.	ER	High Flow Exemption	Where dischargers could demonstrate that a recreational use does not exist, amendment of the state's WQS is needed.
29	SC	ER	Losing	Prohibit any discharge of undisinfected wastewater below I-70
30	Andrew Arnold	ER	Mining	Pumping contaminated water in the Viburnum area into the tribuatries of the Jacks Fork, Current, and Eleven Point rivers is something that I am definitely oppposed to.
31	HBA-SL	ER	ORW	The department should rescind changes to the requirements on effluent limitations on OSRW/ONRWs.
32	Jean Ponzi	ER	ORW	I oppose the proposal to allow wastewater from the floors of lead mines to be pumped into tributaries of Missouri's scenic rivers.
33	Kazie Perkins	ER	ORW	Protect OSRW, particularly Spring and Noblett Creeks in Howell & Douglas County. All no degradation. Do not allow "temporary" lowering of water quality.
34	Kazie Perkins	ER	ORW	Ozark Streams do not recover from gravel mining. (referenced research by Dr. Art Brown, U of Arkansas).
35	L&G	ER	ORW	Total prohibition for discharges to OSRW/ONRWs should be lifted when demonstration can be made that discharges would not result in a standards violation
36	Leon Trumpp	ER	ORW	The proposed rule changes do not adequately protect the watersheds and tributaries of the ONRWs from any future mine dewatering activities.
37	Mat Koeneker	ER	ORW	The proposed rule changes do not adequately protect the watersheds and tributaries of the ONRWs from any future mine dewatering activities.

#	Commentor	Rule	Subject	Summary of Written Comment
38	MDC	ER	ORW	The reference to "temporary lowering" of water quality in ONRW/OSRWs should be deleted.
39	NPS	ER	ORW	The prohibition of discharges within the watershed of ONRWs must be retained.
40	NPS	ER	ORW	Additional beneficial uses must be established for OSRWs to clearly reflect park values followed by criteria to protect those uses.
41	REGFORM	ER	ORW	Restore ability for domestic discharges to tributaries of Outstanding Waters.
42	SC	ER	ORW	There should be no discharges to OSRW/ONRWs
43	SC	ER	ORW	No new or expanded discharges shall be allowed in the watersheds of ORWs.
44	SMCS	ER	ORW	Delete allowance for temporary lowering of water quality in OSRW/ONRWs
45	Sue Skidmore	ER	ORW	The proposed rule changes do not adequately protect the watersheds and tributaries of the ONRWs from any future mine dewatering activities.
46	Tom Kruzen	ER	ORW	The proposed rule changes do not adequately protect the watersheds and tributaries of the ONRWs from any future mine dewatering activities.
47	Tom Kruzen	ER	ORW	Prevention is the way to keep ORS from degradation. No level of monitoring by an inadequately funded MDNR can safeguard them from degradation.
48	L&G	ER	Schedule	Permit holders who have applied for permit renewals but receive a permit after the effect date of the rule due to no fault of their own should get eight years to comply.
49	MAIC	ER	Schedule	Effluent rule should be clear that only facilities needing to disinfect are subject to the compliance schedule.
50	MCCI	ER	Schedule	The proposed rule changes do not allow permittees sufficient time, under certain circumstances, to comply with the proposed whole body contact and secondary contact recreation requirements. Increase the time frame to comply from three to five years.
51	MMU	ER	Schedule	All permit holders should be afforded sufficient time to engineer, finance, construct, and operate to comply with new rules.
52	MMU	ER	Schedule	Permit applications still being worked on by the department should be granted a minimum of 8 years.
53	RCGA	ER	Schedule	Temporary waivers from the new rules should be granted for facilities that have submitted an application for a permit prior to the effective date of the rule.
54	UAC	ER	Schedule	More flexibility in schedule for complying with new bacteria standards (provide 5 years)
55	UAC	ER	WQ Review	Define method for doing study to show no WQ Impacts from lack of disinfection.

#	Commentor	Rule	Subject	Summary of Written Comment
56	FC-PWSD#1	ER	WWTF	Two plants (MO-0114189, MO-125539) are more than two miles from WBCR stream. Request that these plants be removed from the list of plants proposed to require disinfection.
57	FC-PWSD#3	ER	WWTF	Four plants (MO-0105589, MO-0114987, MO-0109908, MO-0126691) are more than two miles from WBCR stream. Request that these plants be removed from the list of plants proposed to require disinfection.
58	SC	ER	WWTF	Any discharge of untreated or partially treated wastewater should require a public notice
59	SC	ER	WWTF	Industrial process water must comply with general water quality standards
60	NPS	Other	Anti-deg	The department does not have sufficient resources to oversee the effects of discharges, therefore the promise to prevent degradation cannot be upheld.
61	L&G	Other	Bacteria	The proposed rule will unnecessarily require elimination of lagoons because of the infeasibility of providing disinfection. This issue is worsened by new limits on trihalomethanes.
62	BCRSD	Other	Fiscal	Spending money to add disinfection to a facility that is targeted for elimination only serves to drive up capital costs and slow down the process of closing small facilities. In the long run, integration and closure of WWTF is the best strategy for the District to improve the water quality of Boone County.
63	Odessa, City of (Wade Sanders)	Other	Fiscal	I believe these standards are too costly for the citizens of Missouri to afford. I also believe most Missourians want environmentally friendly sewers, but only when the costs are reasonable.
64	L&G	Other	Hancock	State should provide resources necessary to the municipalities to comply with the new rule, otherwise the rule may raise Hancock issues.
65	L&G	Other	Hancock	The burden of conducting UAAs should be borne by the state, not the municipality (Hancock issue)
66	Litton Systems	Other	Pretreatment	Concerns about the technical feasibility and potential costs. Delay the finalization of the rule to investigate feasibility and costs.
67	Billy and Kris McMillen	Other	Spring River	Visited Spring River for recreational boating. Large amount of pollution in this river. Would not visit that river again.
68	L&G	Other	WWTF	The movement toward mechanical treatment lacks sufficiently trained operators.
69	Melody Torrey	RIR	Ammonia	RIR does not consider the impact of the proposed raised ammonia levels that would be allowed in the streams, on all aquatic life (macro-invertebrates, fish, and mussels).

#	Commentor	Rule	Subject	Summary of Written Comment
70	Melody Torrey	RIR	Fiscal	I'm concerned that the RIR does not meet the intent of 640.015 RSMo, which as stated in the RIR, is to: (1) provide a summary of information, discussion, input, and rationale used by DNR in development of the draft rule; and (2) ensure accountability, consistency, and transparency in the rulemaking process.
71	Melody Torrey	RIR	Fiscal	RIR does not adequately identify nor describes all persons that will be affected by the proposed rule, specifically those that will bear the cost.
72	Melody Torrey	RIR	Fiscal	RIR fails to quantify the incremental environmental benefits of the proposed rule and relies on subjective and inappropriate statements when describing environmental benefits.
73	Melody Torrey	RIR	Fiscal	RIR does not adequately describe the economics cost of the proposed urle and lacks sufficient backup information to support the economic analyses that were presented.
74	Melody Torrey	RIR	General	RIR does not consider the impact of the proposed rule on wet weather discharges, including urban stormwater runoff, POTW peak flows, combined sewer overflows, and agriculture runoff.
75	Melody Torrey	RIR	Mining	RIR failes to prohibit mine dewatering dishcarge.
76	Melody Torrey	RIR	Schedule	RIR does not provide supporting information to justify the proposed compliance schedules.
77	Melody Torrey	RIR	SCR	RIR does not adequately protect children/citizens from streams classified for secondary contact use.
78	Melody Torrey	RIR	Synergy	RIR does not list metals/chemicals that are sage in certain numbers, but when combined with other substance/metals can be toxic.
79	**Commentor**	**Rule**	**Subject**	**Comment**
80	HBA-SL	WQS	Ammonia	Supports use of EPA's 1999 Ammonia criteria
81	MAIC	WQS	Ammonia	Need a time frame for when early-life stages are present
82	MAIC	WQS	Ammonia	Define when early life stages are present
83	MDC	WQS	Ammonia	The reference to a possible period when chronic toxicity would not have an effect is erroneous in that this period can not be determined.
84	MDC	WQS	Ammonia	The standards for Ammonia should be retained in order to protect the more sensitive species such as mussels (delete new tables).
85	MDC	WQS	Ammonia	Suggests alternative language to define "early life stages" of aquatic life.
86	MDC	WQS	Ammonia	Language on early life stage should be explicit that early life stages of aquatic organisms may be present during all times of the year.
87	MDC	WQS	Ammonia	The definition of early life stages should be expanded to say that other forms of aquatic life other than fish may experience these stages in growth.

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88	MDC	WQS	Ammonia	Professional fishery biologists should be consulted when trying to determine when early life stages are absent.
89	MRWA	WQS	Ammonia	Supports use of 1999 EPA guidance on Ammonia criteria. Urges state to define a seasonal period during which early life stages of fish are present.
90	SC	WQS	Ammonia	Ammonia standards must be protective of mussels and other filter feeders. Consider MDC comments.
91	SC	WQS	Ammonia	Supports of the protection of early life stages of aquatic life
92	SMCS	WQS	Ammonia	Requirements for ammonia criteria for aquatic life protection should consider effects to all forms of aquatic life not just fish.
93	SMCS	WQS	Ammonia	Professional fisheries biologists should be consulted when establishing toxicity periods of early life stages for organisms other than fish.
94	SMCS	WQS	Ammonia	Retain the current ammonia standards to protect freshwater mussels
95	UAC	WQS	Ammonia	Need seasonally based Ammonia Criteria considering temp and pH during river low-flows
96	UAC	WQS	Ammonia	Ammonia Criteria - suggested revisions
97	UAC	WQS	Ammonia	Specify that early life stages relate to FISH
98	William Reeves, Ph.D.	WQS	Ammonia	Supports adopting USEPA's 1999 total ammonia nitrogen criteria.
99	HBA-SL	WQS	Anti-deg	Supports development of an antidegradation implementation procedure
100	NPS	WQS	Anti-deg	The rule must fully comply with the antidegradation standard.
101	NPS	WQS	Anti-deg	The antideg implementation procedure must be in rule, and not just promised by rule.
102	USEPA	WQS	Anti-deg	Schedule for development of Antidegradation Implementation Procedure
103	MDC	WQS	AQL	Reference to the protection of aquatic life should be added to the sentence specifying which uses apply to chronic numeric criteria.
104	MDC	WQS	AQL	Clarification is needed on the difference between a Limited Warm-water Fishery and a General Warm-water Fishery. Suggests alternative language for a GWWF.
105	MDC	WQS	AQL	Suggests alternative definition of a LWWF to include only waters that can not support warm water biota.
106	UAC	WQS	AQL	Offer a UAA to establish site-specific or alternative aquatic life use categories
107	William Reeves, Ph.D.	WQS	AQL metals	Support adopting equation based AQL metals criteria.
108	Dr. Larry Watkins	WQS	Bacteria	No increase in bacterial counts.
109	Dr. Roxanne Stell	WQS	Bacteria	No increase in bacterial counts.
110	L&G	WQS	Bacteria	E. coli standard of 126 should be rounded to 130. Testing methods for E. coli are more complex.

#	Commentor	Rule	Subject	Summary of Written Comment
111	MCE	WQS	Bacteria	Bacteria Standard - Method of Measurement: Need a single sample maximum
112	MDC	WQS	Bacteria	Standards should protect all recreational uses including stream survey efforts and hand-fishing.
113	MDNR-ESP	WQS	Bacteria	Recommend a geometric mean established by sampling not less than four samples over a 30-day period.
114	MDNR-ESP	WQS	Bacteria	Suggest that WBC-A: steady state geometric mean of 126 and single sample maximum allowable density of 235; WBC-B: geomean of 126 and SSM of 406; SCR: geomean of 126 and SSM of 576. Regardless of the actual numbers, I feel strongly that single sample maximums should be included.
115	MDNR-ESP	WQS	Bacteria	The units for bacteria indicators should be "per 100 mLs" rather than CFU/100 mLs or colonies/100 mLs. This will allow for the analyst performing the tests to use either a membrane filter technique (CFU/100 mLs or colonies/100 mLs) or the most probable number technique like we do (MPN/100 mLs). They are both comparable and acceptable methods, but it simplifies reporting if everything is reported the same, such as 126 per 100 mLs.
116	MRWA	WQS	Bacteria	Supports bacteria standard as a geometric mean.
117	MRWA	WQS	Bacteria	Supports E. coli as indicator species
118	MRWA	WQS	Bacteria	Supports the proposed numeric criteria for bacteria (Category A and B)
119	SC	WQS	Bacteria	Bacteria standards should be established at 126 colonies per 100 mL for E. coli and 200 colonies per 100 mL for fecal coliform
120	UAC	WQS	Bacteria	Bacteria Criteria - no suggestions
121	Unnamed Citizen	WQS	Bacteria	The last sentence in the bacteria paragraph referred to FC instead of *E. coli*.
122	USEPA	WQS	Bacteria	E. Coli standard for Category B WBCR must be no more than 206 col / 100mL (proposed as 548)
123	HBA-SL	WQS	Biocriteria	The department should develop specific biocriteria for effluent dominated streams
124	HBA-SL	WQS	Biocriteria	The department should develop regional criteria on aquatic life
125	UAC	WQS	Biocriteria	Biocriteria - (no changes proposed here) need an implementation procedure
126	SC	WQS	Classification	All waters of the state should be classified
127	SC	WQS	Classification	All lakes owned or controlled by governmental entities should be waters of the state and all standards applied
128	Wm Green	WQS	Classification	Man-made drainage ways, which cover the entire bootheel, are not rivers, streams, or creek; they are stormwater drains. These should be considered under a different category than rivers, streams, or creeks.
129	SC	WQS	Definition	Supports clarification of acute and chronic criteria

#	Commentor	Rule	Subject	Summary of Written Comment
130	UAC	WQS	Definition	Definition of Water Hardness should consider effluent hardness in determining seasonal and effluent mixing conditions
131	UAC	WQS	Definition	Revise definition of WET Tests
132	REGFORM	WQS	Detection Level	Total Residual Chlorine standard can't be measured (undetectable). Offer a standard that can be measured and met.
133	BCRSD	WQS	Disinfection	Increasing the number of WWTF that must disinfect will result in a greater risk of chemical accidents among those who will operate the facilities as well as a decrease in water quality as a result of the byproducts of disinfection.
134	William Reeves, Ph.D.	WQS	DWS metals	Support changing the analytical method for DWS metals from dissolved to total recoverable.
135	L&G	WQS	Fiscal	The cost estimates of the rule on the regulated community are understated.
136	L&G	WQS	Fiscal	The use of a social-economic analysis should be expanded in Missouri to provide relief to communities where new rules impose a significant widespread social-economic impact.
137	LBVSD	WQS	Fiscal	Cost for improvements related to these changes to WQS will be borne by the individual ratepayers regardless of their available private resources. There is a restriction for the process to increase customer rates. We would ask for a broader socio-economic hardship provision.
138	MAIC	WQS	Fiscal	The RIR did not discuss the change in the applicability of the Chloride standard, nor was justification and potential costs given.
139	REGFORM	WQS	Fiscal	Rule should consider the fiscal impact to industries that require to pretreat.
140	SAMA	WQS	Fiscal	WQS should be based on scientifically sound, transparent, and peer-reviewed science.
141	SAMA	WQS	Fiscal	Relaible cost-benefit analyses of several alternatives.
142	SAMA	WQS	Fiscal	Pretreatment costs not calculated. RIR costs greatly underestimated.
143	Andrew Arnold	WQS	General	Would like to see more public comment on these changes.
144	Andrew Arnold	WQS	General	Would like to see more enforcement of the existing rules.
145	Andrew Arnold	WQS	General	Would like to see the existing rules tightened (not loosened as appears to be the case here).
146	Andrew Arnold	WQS	General	Not happy that a public meeting was held, just 2 days after a major holiday, in a remote location of the states (Moberly, MO).
147	Brian Sloss	WQS	General	Water is very important to tourism.
148	CS (Kevin Miquelon)	WQS	General	Please do everything in your power to keep our water in Missouri as clean as possible.

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149	Jennifer Daniels	WQS	General	She does not want the water quality standards weakended. They should be more strict.
150	John Fayant	WQS	General	I am against any exemptions for any reason. All of our streams should be as clean as possible. Cost should not be a factor in allowing any sewage plant or factory farm to spoil our streams.
151	Kip Borgschulte	WQS	General	I strongly oppose the proposed water quality standard rules.
152	LBVSD	WQS	General	We would ask a review of standards to reflect the basic requirements instead of stricter than federal law provisions.
153	Rebecca Jackson	WQS	General	She does not want the water quality standards weakended. They should be more strict.
154	Robert Fluehr	WQS	General	"Their should be no exemptions from new rules."
155	Wayne Kirtley	WQS	General	Opposed to any changes that reduce our water quality.
156	SC	WQS	High Flow Exemption	Define "wet weather"
157	Angel Kruzen	WQS	Losing	Feels losing stream analysis needs to be done before a UAA is considered for use removal.
158	SC	WQS	Losing	All streams south of I-70 should be considered losing until a geologic study is completed
159	L&G	WQS	MCLs	Standards to protect drinking water uses in streams need not equal the standards for drinking water.
160	L&G	WQS	MCLs	Limits on trihalomethanes are too restrictve and will prohibit the discharge of waters meeting drinking water standards.
161	UAC	WQS	MCLs	State should provide a scientifically defensable alternative to using MCLs for finished drinking water as the criteria for metals
162	L&G	WQS	Metals	Metals criteria too stringent.
163	L&G	WQS	Metals	Metals criteria based on the protection of trout species, which do not exist in 99% of Missouri's streams. Consequently, the criteria are overly stringent.
164	REGFORM	WQS	Metals	Propose metals standards that take into account the absence of trout from certain (most) waters.
165	SC	WQS	Metals	Supports metals and toxics criteria
166	UAC	WQS	Metals	Metals Criteria - Need for site-specific criteria for metals, and flexible SOCs
167	Brian Sloss	WQS	Mining	Proposed easing of land mining waste disposal would spoil one of the few unspoiled regions in Missouri. The damage would largely outweigh any benefit.
168	Donald Grundy	WQS	Mining	Expresses strong opposition to the changing of regulations on waste from lead minig which may be allowed to leach into Missouri Ozark streams.
169	Ken Morrow	WQS	Mining	Lowering the WQS to allow lead mine industry to discharge their waste into our Ozark streams is outrageous if it is true. He writes a weekly column and various articles for several fishing pubilcations and websites and will be reporting on this information periodically.

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170	Tim Homfeld	WQS	Mining	Politician negotiating mining contracts will create a substantial backlask to the water quality in this region.
171	L&G	WQS	Mixing Zones	The elimination of the mixing zones on low flow streams does not account for the periods that aquatic life is not present in the stream.
172	MAIC	WQS	Mixing Zones	Opposes the deletion of the mixing zone on low-flow streams
173	MAIC	WQS	Mixing Zones	Clarify that mixing zone removal only applies to classified streams
174	REGFORM	WQS	Mixing Zones	Consider alternatives to eliminating the mixing zones in low flow streams.
175	SC	WQS	Mixing Zones	Supports removal of mixing zones in low-flow streams
176	UAC	WQS	Mixing Zones	Clarify that mixing zones are allowed for bacteria
177	UAC	WQS	Mixing Zones	Mixing Zone on < .1cfs streams - instead of no mixing allowed, report as 100% and instantaneous mixing occurs
178	UAC	WQS	Mixing Zones	Need mixing zones for bacteria
179	William Reeves, Ph.D.	WQS	Mixing Zones	Support elimination of mixing zones from streams with a 7Q10 flow of less than 0.1 cfs.
180	MCE	WQS	Nutrient	(separate mailing) Need nutrient criteria. State should adopt EPA guidance.
181	Billy and Kris McMillen	WQS	ORW	MDNR and lead industry is proposing to allow waste water from lead mines to be pumped into tribuataries of Missouri's scenic rivers.
182	Chris Biggins	WQS	ORW	Please reconsider the proposition to allow waste from lead mines to be poured into our ONRWs.
183	Donna Hodges	WQS	ORW	Disturbed by MDNR proposal to allow mine dewatering water to be released into Missouri's ONRWs.
184	Dr. Jay Hodges	WQS	ORW	Please see that mine dewatering continues to be prohibited from occuring in the ONR watersheds.
185	Dr. Larry Watkins	WQS	ORW	Oppose allowing "mine dewatering water" to be released into the ONRW watersheds.
186	Dr. Roxanne Stell	WQS	ORW	Oppose allowing "mine dewatering water" to be released into the ONRW watersheds.
187	Genice and Larry Self	WQS	ORW	MDNR and lead industry is proposing to allow waste water from lead mines to be pumped into tribuataries of Missouri's scenic rivers.
188	Jay Donaldson Hodges	WQS	ORW	Disturbed by MDNR proposal to allow mine dewatering water to be released into Missouri's ONRWs.
189	Jim Ryan	WQS	ORW	Stop any mining company from putting its mine water into the ONRW watersheds.
190	Joe Asinger	WQS	ORW	Lead mining and mine dewatering should be prohibited in Missouri. There is no way to ever reverse the damage done.
191	John Gifford	WQS	ORW	Do not allow wastewater from lead mines to be pumped into Missouri streams.

#	Commentor	Rule	Subject	Summary of Written Comment
192	NPS	WQS	ORW	The replacement of the discharge exceptions for POTWs and mine dewatering with the requirement that all discharges meet the antideg rule is not a sufficient safeguard against degradation within the ONRWs.
193	Rick Brischetto	WQS	ORW	Ask that there be no lowering of WQ to Spring Creek, an OSRW. Since open pit gravel mining started, riparian zone diminished to non-existent. Two fords greatly affect stream depth.
194	S. Ryan Norris	WQS	ORW	Opposed to allowing lead mining waste to be released into ONRWs.
195	Sara Firman-Pitt	WQS	ORW	Object to any lowering of water quality - temporary or not - in OSRWs. I have concluded, through research, that it is impossible to be sure that no long-term effects will result from repeated (such as occurs with gravel operations) temporary lowering of water quality - even if not below WQS - on the health of the creek.
196	Sara Firman-Pitt	WQS	ORW	Keep Spring Creek in Douglas County as an OSRW. Safeguard all OSRW in the state for sake of long-term health and needs of the wider community and not bow to the short-term interests of private businesses.
197	SC	WQS	ORW	The designation of Outstanding Resource Waters should not be dependent on ownership.
198	SMCS	WQS	ORW	Add reference to rare and endangered species as a reason for designating OSRW/ONRW (in definition and in criteria for designation)
199	Stacy Self (& family)	WQS	ORW	Lead mining and mine dewatering should be prohibited in Missouri. There is no way to ever reverse the damage done.
200	Tristan Kruzen	WQS	ORW	Stop any mining company from putting its mine water into the ONRW watersheds.
201	William Reeves, Ph.D.	WQS	ORW	Supports new limitations on discharges to ORWs.
202	William Reeves, Ph.D.	WQS	ORW	Supports adding Bull Creek to the list of OSRWs.
203	MDC	WQS	R&E	Recommends adding the presence of R&E species as a reason to designate a water as an OSRW.
204	HBA-SL	WQS	Schedule	Implementation schedule should be extended to allow up to five years for compliance with the proposed rules
205	LBVSD	WQS	Schedule	We would ask for a longer time line for compliance.
206	MRWA	WQS	Schedule	Implemenation schedule should be lengthened and should consider time necessary to conduct studies and to implement plans following the completion of studies.
207	MRWA	WQS	Schedule	Requests expansion of compliance schedule from 3 years to 5.
208	RCGA	WQS	Schedule	The rules should provide up to 5 years for compliance upon issuance of a permit.
209	SC	WQS	Schedule	All facilities should not be granted more than 3 years from the effective date of the rule to comply with the bacteria standard

#	Commentor	Rule	Subject	Summary of Written Comment
210	UAC	WQS	Schedule	Compliance Schedules - Rule should be amended to allow for a compliance schedule longer than 3 years, suggests 5 years. Longer for CSO communities.
211	Andrew Arnold	WQS	SCR	Opposed to changes that would allow a substantial increase in the amount of E. coli and FC allowed into these waterways. I don't care how little they are used by the public for recreation.
212	Billy and Kris McMillen	WQS	SCR	opposed to SCR and higher bacteria colonies.
213	Genice and Larry Self	WQS	SCR	opposed to SCR and higher bacteria colonies.
214	Jean Ponzi	WQS	SCR	Strongly oppose proposed SCR and higher bacteria count use of waters of the state. A nine-fold increase in bacteria in rivers is unaccepatable.
215	Joe Asinger	WQS	SCR	Massive counts of fecal coliform and *E. coli* bactera released into our river where we swim with our children nearly everyday in the summer is not OK. Opposed to secondary contact use and higher bacteria colonies.
216	L&G	WQS	SCR	Supports secondary contact recreation use category
217	Leon Trumpp	WQS	SCR	Oppose proposed SCR and higher bacteria count use of waters of the state. A nine-fold increase in bacteria in rivers is unaccepatable.
218	MAIC	WQS	SCR	Supports the change of Boating and Canoeing use title to SCR and the associated lesser criteria based on less contact
219	Mat Koeneker	WQS	SCR	Oppose proposed SCR and higher bacteria count use of waters of the state. A nine-fold increase in bacteria in rivers is unaccepatable.
220	SC	WQS	SCR	Delete designation for Secondary Contact Recreation. All waters should be designated for WBCR.
221	Stacy Self (& family)	WQS	SCR	Massive counts of fecal coliform and *E. coli* bactera released into our river where we swim with our children nearly everyday in the summer is not OK. Opposed to secondary contact use and higher bacteria colonies.
222	Sue Skidmore	WQS	SCR	Oppose proposed SCR and higher bacteria count use of waters of the state. A nine-fold increase in bacteria in rivers is unaccepatable.
223	Susan Koeneker	WQS	SCR	Do not support the secondary contact standards proposed. If we continue to lower our standards, our children will never know the joy of clear rivers and streams that suppport natural forms that are unhampered and/or not destroyed by chemicals and pollutants (in this case, *E. coli* and fecal coliform).
224	HBA-SL	WQS	Site-specific	Supports site-specific criteria
225	MAIC	WQS	Site-specific	Need specific water quality criteria for channelized or hydrologically modified lakes and reservoirs
226	MAIC	WQS	Site-specific	Instead of deleting Section 3, propose an alternative DO standard of 3.0 for certain streams
227	MAIC	WQS	Site-specific	Clarify whether (4)(R)1.A and B. are conjunctive or disjunctive.

#	Commentor	Rule	Subject	Summary of Written Comment
228	MAIC	WQS	Site-specific	Clarify that site-specific criteria may apply to a subsegment of a classified stream reach.
229	MDC	WQS	Site-specific	The use of test species as surrogates may be an acceptable practice in defining the sensitivity of a aquatic assemblage in a stream, therefore, the fact that a stream has different species than the test organisms may not be a good reason to alter the water quality criteria.
230	MDC	WQS	Site-specific	Making a full comparison between different streams, even those within the same watershed, is too difficult and will likely not achieve a confident finding on special aquatic life adaptations. Delete allownace to consider several streams within a watershed as "one site"
231	MDNR-ESP	WQS	Site-specific	The idea that "the composition of aquatic species in a water body is different from those used in deriving a criterion…" loses sight of the purpose of using "surrogate" species to determine criteria. In no way does the absence of a surrogate species reflect a reduced need to protect a water body for other speicies that may be similar in sensitivity.
232	MRWA	WQS	Site-specific	Requests opportunity in the rule to explore site-specific metals criteria, using water effect ratios, and total to dissolved metals translators.
233	MRWA	WQS	Site-specific	Supports site-specific criteria. Requests ability to use a reference stream approach.
234	SC	WQS	Site-specific	Supports site-specific criteria
235	UAC	WQS	Site-specific	Revise definition for Water Effect Ratio, to better clarify the use of this process for determining metals toxicity
236	UAC	WQS	Site-specific	Need a provision for state to develop site-specific DO criteria
237	UAC	WQS	Site-specific	Add reference to new (4)(R) where language about site-specific criteria is being deleted
238	UAC	WQS	Site-specific	Site-specific Criteria - include a Reference condition approach. Write rule to avoid need for specific procedures in rule but rather have them in guidance. Have EPA approve the guidance to avoid having to approve each site-specific criterion. Site-specific criteria should be able to apply to regions and watersheds in addition to individual waterbodies. State should discuss with EPA the circumstances in which the use of Cladocerans (a sensitive species) is not appropriate in developing the metals criteria.
239	UAC	WQS	Site-specific	Site-specific Criteria - the methods for determining biological availability of toxics should be broadened to include the use of water effect ratios and translators.
240	Andrew Arnold	WQS	Synergy	Synergy is not considered.
241	Billy and Kris McMillen	WQS	Synergy	Need to recognize synergy effects in the proposed rules
242	Genice and Larry Self	WQS	Synergy	Need to recognize synergy effects in the proposed rules

#	Commentor	Rule	Subject	Summary of Written Comment
243	Jean Ponzi	WQS	Synergy	Synergy is not considered. Urge CWC to study and rule based on how chemical actions combine to produce unforeseem effects.
244	Joe Asinger	WQS	Synergy	Synergy is not considered.
245	Leon Trumpp	WQS	Synergy	Synergy is not considered.
246	Stacy Self (& family)	WQS	Synergy	Synergy is not considered.
247	Sue Skidmore	WQS	Synergy	Synergy is not considered.
248	MDC	WQS	Table A	Dissolved oxygen standards should reflect the greater sensitivities of early life stages to low DO.
249	UAC	WQS	Table A	Criteria for Designated Uses - Rule should not move away from considering the differing sensitivities between different aquatic assemblages when developing criteria.
250	Jim Kahrs	WQS	Table H	Harper Hollow Creek in Camden county should be listed as a P water. The creek has maintained a permanent flow since 1953, sufficient to operate a hatchery operation, catfish farm, and maintain aquatic life.
251	SC	WQS	Temperature	+ 5 degrees of ambient stream temperature should be the standard on effluent entering waters of the state
252	BCRSD	WQS	UAA	The department should develop an approach to WBCR use designations that considers the socio-economic impact on communities
253	HBA-SL	WQS	UAA	Need a definition for "existing use"
254	L&G	WQS	UAA	The rules present a possibility that recreational use will be designated based on bogus data.
255	MCE	WQS	UAA	UAAs -Must not rely solely on depth criterion.
256	MCE	WQS	UAA	I am assuming that your UAA team is considering stream team data that has been submitted over the years. I think that DNR staff must consider any such data if a UAA passes the initial screen.
257	MMU	WQS	UAA	Assumption that stream use and conditions in 1975 and ensuing years are the same today. Many northern Missouri streams have been channelized.
258	MRWA	WQS	UAA	A definition for "existing use" is needed. Definition should require that a use actually occur and that water quality is sufficient to support the use.
259	SC	WQS	UAA	UAAs should not result in use removal because of lack of past use. The lack of use may be attributable to high bacteria counts, which if human related, should be addressed.
260	UAC	WQS	UAA	Add a definition for UAA
261	UAC	WQS	UAA	Add a definition for "existing beneficial uses"
262	MRWA	WQS	Unclassified	Supports use of general criteria for protecting unclassified streams
263	MDC	WQS	Use Designations	MDC wishes to work with DNR on some use designations.
264	Angel Kruzen	WQS	WBC	Uses before November 28, 1975 should be protected.

#	Commentor	Rule	Subject	Summary of Written Comment
265	Jim Ryan	WQS	WBC	All waters of the state were fishable and swimmable in the early nineteenth century when Lewis and Clark journeyed through Missouri. For you to propose that the citizens of this state accept that many of their streams will be given "secondary use status" is a retreat from forcing polluters to clean up.
266	Sedalia, City of (Bill Beck)	WQS	WBC	Evaluating a specific body of water, classifying it, and then taking the proper steps to insure the necessary water quality is appropriate was a good approach. To mandate that each classified body of water will be considered useful for WBC seems to be a reversal of the good logic used in the past.
267	Tristan Kruzen	WQS	WBC	All the streams in Missouri should be for full body contact.
268	William Reeves, Ph.D.	WQS	WBC	I must take strong exception to the department's attempt to assign lesser contact recreation use to streams and lakes without conducting UAAs. The way the department has attempted to assign the Class B recreational use does not meet the goal of the Clean Water Act Section 101(a)(2).
269	HBA-SL	WQS	WBCR	Supports tiered WBCR use designation and criteria
270	HBA-SL	WQS	WBCR	Supports use of Category B criteria for waters newly designated for WBCR
271	L&G	WQS	WBCR	Disinfection should not be required where uses don't exist
272	L&G	WQS	WBCR	The department should return to the earlier method for designating recreational uses (i.e. when the issues are discovered)
273	MAIC	WQS	WBCR	Supports two categories of bacteria criteria
274	MRWA	WQS	WBCR	Supports tiered WBCR use designation. Future Category A designations should require a structured analysis to establish whether or not the water meets the definition of that category.
275	NPS	WQS	WBCR	All streams within the boundaries of the Ozark Natural Scenic Riverways should be designated for WBCR, and not just A, but A+ to reflect natural background concentrations.
276	NPS	WQS	WBCR	Proposed bacterial standards are above the natural background levels in the ONRWs and therefore do not represent the antidegradation rule. Site-specific standards should be developed for the ONRWs (such as what was done in the Jacks ForK River TMDL) and those standards incorporated into rule.
277	UAC	WQS	WBCR	Add sentence to allow for upgrading of recreation uses through UAAs
278	UAC	WQS	WBCR	Remove sentence that all waters in Tables G and H are designated for WBCR
279	SC	WQS	Wetland	Supports site-specific criteria for wetlands but should consider regional differences in wetlands types

Written Comments on
10 CSR 20-7.015 Effluent Regulations and
10 CSR 20-7.031 Water Quality Standards

#	Commentor	Rule	Subject	Summary of Written Comment
280	SC	WQS	Wetland	Many questions should be answered about wetlands rules before any action is taken
281	UAC	WQS	Wetland	Wetlands - intent to develop site-specific criteria - no need to mention in rule